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2 District of Nevada

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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 CRYSTAL SUAREZ,) 2:14-cv-02100-JAD-GWF
13 Plaintiffs,) Case No. ~~2:12-cv-02100-JAD-GWF~~
14 v.)
15 MERIDIAN PROPERTY SERVICES;)
FRANCISCO ARCE, UNITED STATES OF)
16 AMERICA; DOE individuals I through XX,)
and ROE CORPORATIONS I through XX,)
17 Defendants.)
18 _____)

19 **MOTION FOR EXTENSION OF TIME**
(First Request)
20

21 The United States of America respectfully requests an extension of time to file a Joint Status
22 Report herein.

23 In support of the instant Motion, the Federal Defendant submits the following:

- 24 1. This Motion is brought in order to accommodate the parties to this case.
25 2. Over the course of this week the parties exchanged a proposed Joint Status Report.

26 However, the parties were unable to further discuss and finalize the Joint Status Report. The parties'

counsel intend to discuss and finalize the proposed Joint Status Report this Tuesday, January 20, 2015, and file it with the Court shortly thereafter. For this reason the parties request a brief extension to allow them to finalize the Joint Status Report.

3. The instant motion is filed in good faith and not for the purposes of delay.

WHEREFORE, for the above reasons, the United States respectfully requests the instant Motion extending time until January 23, 2015, to file a Joint Status Report, be granted.

Respectfully submitted this 16th day of January 2015.

DANIEL G. BOGDEN
United States Attorney

/s/ Justin E. Pingel
JUSTIN E. PINGEL
Assistant United States Attorney

IT IS SO ORDERED:

George Foley Jr.
GEORGE FOLEY JR.

GEORGE FOOTE, JR.
United States Magistrate Judge

United States Magistrate Judge
DATED: January 20, 2015

PROOF OF SERVICE

I, Justin E. Pingel, AUSA, certify that the following individual was served with the **MOTION FOR EXTENSION OF TIME** on this date by the below identified method of service:

Electronic Case Filing:

Steven Dimopoulos
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Attorneys for Plaintiff

Dated this 16th day of January 2015.

/s/ Justin E. Pingel
JUSTIN E. PINGEL
Assistant United States Attorney